



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CV16 5033 BHS-JR

Gregory Antonio Wright
(Name of Plaintiff)

vs.

CIVIL RIGHTS COMPLAINT
BY A PRISONER UNDER 42
U.S.C. § 1983

Conmed Healthcare Management INC.

(Names of Defendant(s))

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner?:

☒ Yes ☐ No

B. If your answer to A is yes, how many?: 1. Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff: Gregory Antonio Wright

Defendants: Sergeant Grant Austin

2. Court (give name of District): U.S. District Court For The Western District of Washington
3. Docket Number: 3:15-cv-05887-BHS-JRC
4. Name of judge to whom case was assigned: Judge Benjamin H. Settle
5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?):
Still pending
6. Approximate date of filing lawsuit: December 4, 2015
7. Approximate date of disposition: still pending

II. Place of Present Confinement: Clark County Jail

- A. Is there a prisoner grievance procedure available at this institution? ☒ Yes ☐ No
- B. Have you filed any grievances concerning the facts relating to this complaint?
☒ Yes ☐ No

If your answer is NO, explain why not:

- C. Is the grievance process completed? ☒ Yes ☐ No

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

- A. Name of Plaintiff: Gregory Antonio Wright Inmate No.: 144943
- Address: PO Box 1147, Vancouver, Washington 98666

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

- B. Defendant: Conmed Healthcare Management Inc. Official Position: Employer of Staff
- Place of employment: Conmed Healthcare Management/Clark County Jail

INMATE GRIEVANCE/DISCIPLINARY APPEAL FORM

CLARK COUNTY JAIL

INMATE NAME: Gregory Antonio Wright
 CFN: 144943 POD: A3-3 DATE: 12-14-15

☒ **ORIGINAL**
☒ GRIEVANCE
☐ DISCIPLINARY APPEAL

FORM PROCEDURES:

- Request an Inmate Grievance/Disciplinary Appeal Form from your pod officer.
- You MUST use this original form for each level. Each response will be placed on the back of the form for your review.
- Submit the completed form to your pod officer, who will receive it and may place comments then forward to the appropriate administrative level.
- Each administrative level has a specific # of days to respond. Refer to Grievance or Disciplinary Appeal timeline below.
- You will receive a written response.
- After receiving the response, if you're not satisfied, you may continue your grievance to the next administrative level.
- You have a specific # of days to file to next level. Refer to Grievance or Disciplinary Appeal timeline below.
- Filing to the next level requires you to state a reason why you disagree with the response, and enter the date.
- All steps must be followed in order to consider the administrative remedies "Exhausted."

FORMS THAT DO NOT CONFORM TO THE GUIDELINES LISTED BELOW WILL BE REJECTED:

Late filings. (Unless approved by a supervisor)

Use of profanity is not acceptable unless you are quoting a direct statement.

Forms that contain hostile, sexual or threatening language will be returned to you for resubmission.

GRIEVANCE	Attempt to resolve a grievance informally through verbal communication with your pod officer or the employee concerned.
	A grievance must concern a jail rule, complaint of specific oppression or misconduct by an officer/employee.
	Group grievances or grievances submitted on behalf of another inmate will not be accepted.
	The following are not grievable issues: <ul style="list-style-type: none"> - Federal, state or local statutes. - Court decisions, or decisions of an inmate's attorney. - Disciplinary sanctions. (Refer to the disciplinary appeals section of the inmate handbook.)

	GRIEVANCE TIMELINES	DISCIPLINARY APPEAL TIMELINES
YOU	You have up to seven (7) days to file a written grievance once you become aware of a grievable issue. You have only forty eight (48) hours from receiving the response to file your grievance to the next level.	You have within twenty four (24) hours of receiving your infraction notice or response to appeal or appeal to the next level. (Minor infractions can only be appealed to the second level.)
ADMIN	The Sergeant/Supervisor has five (5) business days to respond. Each administrative level; Commander/Manager and Jail Administrator has ten (10) business days to respond.	Each administrative level; Sergeant/Supervisor, Commander/Manager, and Jail Administrator has five (5) business days to respond.

STATE YOUR CASE - PLEASE BE SPECIFIC (include date, time and people involved): On Saturday Morning
I had 5 Seizure's but i would like to know why i wasn't taken to
the hospital after i had my first 2? Mr. Richard Burger called for
help for me when he was on his hour out. Code Blue was called on me
twice and the only thing that happened was i was rolled over onto
my side and i still ended up having a couple of seizure's

WHAT RESOLUTION ARE YOU REQUESTING? - (Your requested resolution cannot be changed during appeal process)

I want to know why wasn't i taken to the hospital so i could
get the proper medical care? after my second seizure i should
have been taken to the hospital. I wasn't even allowed to go to medical, why?
I want to know why i wasn't able to get the proper medical treatment

OFFICER'S COMMENTS: _____

Accepting Officer: Phkumble

PSN: 1091

Date: 12/16/15

ADMINISTRATIVE LEVELS**LEVEL 1 – MINOR OR MAJOR INFRACTIONS OR GRIEVANCE – SGT/SUPV****RESPONSE:**

~~You were seen by medical staff and it was determined that your medical conditions can be addressed by~~
 our medical provider. They responded to your cell to assess you and there was no need to send you to
 the medical unit. The medical director has reviewed your records and has ordered seizure medication
 and you have not been completely compliant with those medications. Proper medical care is being
~~offered and you are not willing to follow the recommendations. You have refused your medication~~
 nearly 50% of the time since it was prescribed four days ago.

SGT/SUPV NAME:

Sgt Alt

RESPONSE DATE

2.17.15

LEVEL 2 – MINOR OR MAJOR INFRACTIONS OR GRIEVANCE – CMDR/MGR

STATE REASON AND ENTER DATE TO FORWARD TO NEXT LEVEL

DATE SUBMITTED:

State reason why you disagree with response (REQUIRED)

RESPONSE:

CMDR/MGR NAME:

RESPONSE DATE

THIS RESPONSE IS FINAL FOR MINOR INFRACTIONS

NO RESPONSE - REASON:

LEVEL 3 – MAJOR INFRACTIONS OR GRIEVANCE ONLY - JAIL ADMINISTRATOR

STATE REASON AND ENTER DATE TO FORWARD TO NEXT LEVEL

DATE SUBMITTED:

State reason why you disagree with response (REQUIRED)

RESPONSE:

JAIL ADMINISTRATOR:

RESPONSE DATE:

NO RESPONSE - REASON:

C. Additional defendants _____

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. If you allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.)

On 12-12-15 Between the hours of 9:00 a.m and 10:30 a.m I had 4 to 5 seizures in my cell in A3-3 at the Clark County Jail. One of my seizures took place while the inmate Richard Burgees was out on his hour out in the dayroom, he seen me having a seizure and told the Pod officer who contacted medical staff. All medical staff did was roll me on to my side and left. I don't know how long after i had my first seizure that i had my second seizure and so on. I was told by medical staff that all together i had 5 seizure's at different times and medical staff called code blue on me 5 different times, and everytime medical staff came to my cell all they did was roll me on to my side and left. 5 different times i was left to die. Everything i just told you was caught on video tape and my attorney has a copy of that video. There was a inmate in cell A3-1 who about a month and a half befor or 2 months befor had only one seizure and the medical staff came down to our pod and took him to medical and housed him so they could keep a eye on him. I have 4 to 5 seizure's and 5 code blues called on me and i'm left in my cell, i don't even get to go to medical to were i could get the proper medical attention. After my 3rd seizure and after the 3rd code blue was called i should have been taken to the hospital to see a doctor or at least up to medical for the proper medical attention. I didn't get to see the doctor here until the next morning, and for a year i've been trying to get on the right seizure medication here that i take, but the doctor kept giving me the wrong one so i stoped taking it because he refused to change my medication to the one i take, even my mother Carmella Wilson has called down here but the medical staff wouldn't listen. Now my left arm is always sore from floping around on the ground and my head is always hurting (from hitting the floor during my seizure's). All this could have bee avoided if i was taken to the hospital or to medical to receive the proper medical attention. Now i'm on the right seizure medication, I almost died because of the lack of Profer medical training. I'm filing my lawsuit against Conmed Healthcare management INC. because the medical staff here is employed through and work for them.

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

I want monetary Relief, I want the court to grant me 8 million.
I want the court to get a copy of the video and to watch it.
I want my criminal Record Esponged.
I want my current Criminal Charges Dismissed.
I want Conmed at the Clark County Jail looked into.
I want the Clark County Jail investigated For how the Jail is Ran
I want the court to set me Free so I can Start my life over.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8th day of January 20 16.

Megany Antonio Wright
(Signature of Plaintiff)